



Ashleigh Rousseau &lt;ashleigh@pabilaw.org&gt;

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**United States and State of New York ex rel Donohue v. Richard Carranza, et al [20-cv-05396]**

8 messages

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**Ashleigh Rousseau <ashleigh@pabilaw.org>**  
To: ServiceECF@law.nyc.gov, Hearings Pabilaw <hearings@pabilaw.org>

Thu, Nov 18, 2021 at 5:59 PM

**[FINAL EXHIBITS.zip](#)****[Date Stamped Qui Tam\\_Pro Se Filing Office .pdf](#)**

Good evening,

Please see attached the complaint and exhibits that have been filed in the Southern District for this matter.

Thank you,

Ashleigh

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Ashleigh C. Rousseau, Esq.

**BRAIN INJURY  
RIGHTS GROUP****Ashleigh C. Rousseau, Esq. | Attorney**300 East 95th Street, Suite #130  
New York, New York 10128Tel. 646.850.5035  
[braininjuryrights.org](http://braininjuryrights.org)

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**Marke, Ariton (Law) <amarke@law.nyc.gov>**  
To: Ashleigh Rousseau <ashleigh@pabilaw.org>

Fri, Nov 19, 2021 at 9:03 AM

Hell- we can only view files are PDFs. Please send documents as PDFs.

Thank you

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**From:** Ashleigh Rousseau <[ashleigh@pabilaw.org](mailto:ashleigh@pabilaw.org)>  
**Sent:** Thursday, November 18, 2021 5:59 PM  
**To:** ServiceECF (Law) <[ServiceECF@law.nyc.gov](mailto:ServiceECF@law.nyc.gov)>; Hearings Pabilaw <[hearings@pabilaw.org](mailto:hearings@pabilaw.org)>  
**Subject:** [EXTERNAL] United States and State of New York ex rel Donohue v. Richard Carranza, et al [20-cv-05396]

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [phish@cyber.nyc.gov](mailto:phish@cyber.nyc.gov) as an attachment (Click the More button, then forward as attachment).

[Redacted]

Good evening,

[FINAL EXHIBITS.zip](#)

Please see attached the [complaint and exhibits that have been filed in the Southern District for this matter.](#) [Date Stamped Qui Tam\\_Pro Se Filing Office.pdf](#)

Thank you,

Ashleigh

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Ashleigh C. Rousseau, Esq.

**Ashleigh C. Rousseau, Esq. | Attorney**  
300 East 95th Street, Suite #130  
New York, New York 10128  
Tel. 646.850.5035  
[braininjuryrights.org](http://braininjuryrights.org)

[Quoted text hidden]

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**Ashleigh Rousseau** <[ashleigh@pabilaw.org](mailto:ashleigh@pabilaw.org)>  
To: "Marke, Ariton (Law)" <[amarke@law.nyc.gov](mailto:amarke@law.nyc.gov)>, Hearings Pabilaw <[hearings@pabilaw.org](mailto:hearings@pabilaw.org)>

Fri, Nov 19, 2021 at 9:28 AM

- [!\[\]\(098e47036f78288d477e334896a43770\_img.jpg\) Exhibit 1\\_IDEA Part B Letters \[2020, 2021\]\[Alpha...\]](#)
- [!\[\]\(4eae4ca9e3bdd839cea72df3843a6754\_img.jpg\) Exhibit 2\\_NYC\\_Comptroller Stringer Audit Finds ...](#)
- [!\[\]\(85c10fe0ae97c3e2f0e940987ab0a900\_img.jpg\) Exhibit 3\\_JR 2020 IEP\\_Redacted.pdf](#)
- [!\[\]\(886bb00f68a0102765319f7e3e73d979\_img.jpg\) Exhibit 4\\_JR Remote IEP\\_Redacted.pdf](#)
- [!\[\]\(0fbfb77cc5f54acd9a6cc5e2e99729c4\_img.jpg\) Exhibit 5\\_J.R. Transcript \[Redacted\]\\_Redacted.pdf](#)
- [!\[\]\(bcfed6d10b13d512440f89f52a81eafd\_img.jpg\) Exhibit 6\\_SJD Transcript\\_185111\\_10.1.20\\_Redacte...](#)
- [!\[\]\(7c161aecd27f28132b5df13a9dbd5b32\_img.jpg\) Exhibit 7\\_SJD Redacted & Numbered Trancrpt \[19...](#)
- [!\[\]\(373b3207d9e62a918403ab5e91b2855d\_img.jpg\) Exhibit 8\\_NYC DOE\\_DECEMBER\\_2020\\_FSR.pdf](#)

<a href="#"> Exhibit 9_GM 2020 IEP[Redacted].pdf</a>
<a href="#"> Exhibit 10_Autism Services Letter to GM.pdf</a>
<a href="#"> Exhibit 11_TS 2020 IEP [Redacted].pdf</a>
<a href="#"> Exhibit 12_P.M. 2020 Proposed IEP_Redacted.pdf</a>
<a href="#"> Exhibit 13_Massachusetts 2020 year End Report c...</a>
<a href="#"> Exhibit 14_HP 2020 IEP_Redacted.pdf</a>
<a href="#"> Exhibit 15_BW 2020 IEP_Redacted.pdf</a>
<a href="#"> Exhibit 16_TA 2020 IEP_Redacted.pdf</a>
<a href="#"> Exhibit 17_AK 2020 IEP_Redacted.pdf</a>
<a href="#"> Exhibit 18_CA 2020 IEP_Redacted.pdf</a>
<a href="#"> Exhibit 19_MR 2020 IEP_Redacted.pdf</a>
<a href="#"> Exhibit 20_JM 2020 IEP.pdf</a>
<a href="#"> Exhibit 20_JM 2020 IEP_Redacted.pdf</a>
<a href="#"> Exhibit 21_AC IEP [Wake County, NC]_Redacted.pdf</a>
<a href="#"> Exhibit 22_AN 2020 IEP TX_Redacted.pdf</a>

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**Marke, Ariton (Law)** <amarke@law.nyc.gov>  
To: Ashleigh Rousseau <ashleigh@pabilaw.org>

Fri, Nov 19, 2021 at 9:41 AM

These are still links for google drive. They need to be PDFs.

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**From:** Ashleigh Rousseau <ashleigh@pabilaw.org>  
**Sent:** Friday, November 19, 2021 9:28 AM  
**To:** Marke, Ariton (Law) <amarke@law.nyc.gov>; Hearings Pabilaw <hearings@pabilaw.org>  
**Subject:** Re: [EXTERNAL] United States and State of New York ex rel Donohue v. Richard Carranza, et al [20-cv-05396]

<a href="#"> Exhibit 1_IDEA Part B Letters [2020,</a>
<a href="#"> Exhibit 2_NYC_Comptroller Stringer</a>
<a href="#"> Exhibit 3_JR 2020 IEP_Redacted.pdf</a>
<a href="#"> Exhibit 4_JR Remote IEP_Redacted.pdf</a>

[Exhibit 5\\_J.R. Transcript \[Redacted\].pdf](#)

[Exhibit 6\\_SJD Transcript\\_185111\\_10.1.pdf](#)

[Exhibit 7\\_SJD Redacted & Numbered](#)

[Exhibit 8\\_NYC DOE\\_DECEMBER\\_202](#)

[Exhibit 9\\_GM 2020 IEP\[Redacted\].pdf](#)

[Exhibit 10\\_Autism Services Letter to G](#)

[Exhibit 11\\_TS 2020 IEP \[Redacted\].pdf](#)

[Exhibit 12\\_P.M. 2020 Proposed IEP\\_Re](#)

[Exhibit 13\\_Massachusetts 2020 year E](#)

[Exhibit 14\\_HP 2020 IEP\\_Redacted.pdf](#)

[Exhibit 15\\_BW 2020 IEP\\_Redacted.pdf](#)

[Exhibit 16\\_TA 2020 IEP\\_Redacted.pdf](#)

[Exhibit 17\\_AK 2020 IEP\\_Re](#)

[Exhibit 18\\_CA 2020 IEP\\_Re](#)

[Exhibit 19\\_MR 2020 IEP\\_Re](#)

[Exhibit 20\\_JM 2020 IEP.pdf](#)

[Exhibit 20\\_JM 2020 IEP\\_Redacted.pdf](#)

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[Exhibit 21\\_AC IEP \[Wake County, NC\] Re](#)

Fri, Nov 19, 2021 at 6:58 PM

**Ashleigh Rousseau** <ashleigh@pabilaw.org>

To: "Marke, Ariton (Law)" <amarke@law.nyc.gov>

Exhibits 17-22

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## 6 attachments

 [Exhibit 22\\_AN 2020 IEP TX\\_Redacted-compressed.pdf](#)  
619K

 [Exhibit 20\\_JM 2020 IEP\\_Redacted-compressed.pdf](#)  
394K

 [Exhibit 21\\_AC IEP \[Wake County, NC\]\\_Redacted-compressed.pdf](#)  
1226K

 [Exhibit 19\\_MR 2020 IEP\\_Redacted-compressed.pdf](#)  
1727K

 [Exhibit 18\\_CA 2020 IEP\\_Redacted-compressed.pdf](#)

2168K

 **Exhibit 17\_AK 2020 IEP\_Redacted-compressed.pdf**  
1641K

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**Ashleigh Rousseau** <ashleigh@pabilaw.org>  
To: "Marke, Ariton (Law)" <amarke@law.nyc.gov>

Fri, Nov 19, 2021 at 6:59 PM

Exhibits 9-16

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**8 attachments**

-  **Exhibit 14\_HP 2020 IEP\_Redacted-compressed.pdf**  
735K
-  **Exhibit 16\_TA 2020 IEP\_Redacted-compressed.pdf**  
1304K
-  **Exhibit 13\_Massachusetts 2020 year End Report copy-compressed.pdf**  
1544K
-  **Exhibit 12\_P.M. 2020 Proposed IEP\_Redacted-compressed.pdf**  
1594K
-  **Exhibit 11\_TS 2020 IEP [Redacted]-compressed.pdf**  
956K
-  **Exhibit 10\_Autism Services Letter to GM-compressed.pdf**  
438K
-  **Exhibit 15\_BW 2020 IEP\_Redacted-compressed.pdf**  
2127K
-  **Exhibit 9\_GM 2020 IEP[Redacted]-compressed.pdf**  
2026K

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**Ashleigh Rousseau** <ashleigh@pabilaw.org>  
To: "Marke, Ariton (Law)" <amarke@law.nyc.gov>

Fri, Nov 19, 2021 at 6:59 PM

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**6 attachments**

-  **Exhibit 4\_JR Remote IEP\_Redacted-compressed.pdf**  
65K
-  **Exhibit 5\_J.R. Transcript [Redacted]\_Redacted-compressed.pdf**  
505K
-  **Exhibit 7\_SJD Redacted & Numbered Trancrip [196228](7.14.21)-compressed.pdf**  
776K
-  **Exhibit 8\_NYC DOE\_DECEMBER\_2020\_FSR-compressed.pdf**  
719K
-  **Exhibit 6\_SJD Transcript\_185111\_10.1.20\_Redacted-compressed.pdf**  
792K
-  **Exhibit 3\_JR 2020 IEP\_Redacted-compressed.pdf**  
2481K

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**Ashleigh Rousseau** <ashleigh@pabilaw.org>  
To: "Marke, Ariton (Law)" <amarke@law.nyc.gov>

Fri, Nov 19, 2021 at 7:00 PM

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**2 attachments****Exhibit 2\_NYC\_Comptroller Stringer Audit Finds the City Lost \$179 Million Due to Mismanagement of DOE** **Medicaid Reimbursement Claims for Special Education Services \_ Office of the New York City Comptroller Scott M. Stringer-compressed.pdf**

486K

 **Exhibit 1\_IDEA Part B Letters [2020, 2021][Alphabetical]-compressed.pdf**

19694K